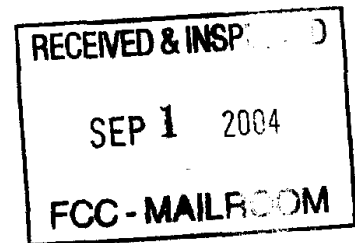


**Before the
Federal Communications Commission
Washington, D.C. 20554**



In the Matter of

Amendment of Parts 2 and 90 of the Commission's]
Rules to Provide for Narrowband Private Land]
Mobile Radio Channels in the 150.05-150.8 MHz,]
162-174 MHz, and]
406.1-420 MHz Band that are allocated for]
Federal Government Use]

ET Docket No. 04-243

**COMMENTS OF
YAMHILL COMMUNICATIONS AGENCY**

Yamhill Communications Agency submits these comments in response to the Federal Communications Commission's above referenced docket.

Background

The above referenced docket addresses narrow banding several frequencies not previously covered in the Commission's narrowband rulings. These comments address only the section of the ruling covering 163.250 MHz.

Yamhill Communications Agency provides dispatch services and the 9-1-1 answering point (PSAP) for a large portion of Yamhill County, Oregon. Dispatch services are provided for first responders (Fire, EMS, Police) including both paid and volunteer personnel.

For decades, two-tone sequential paging signals transmitted to portable paging receivers, worn by first responders, has been used as the primary method of alerting Fire and EMS personnel.

This system used low band frequencies and suffered from "skip" interference and lack of building penetration necessary to meet the requirements of today's emergency services.

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The two-tone sequential paging process can take 30 seconds or longer to alert First Responders and therefore adds to the overall response time.

Yamhill Communications Agency has determined that a system that would support the current two tone paging format, with the ability to transition to a faster alphanumeric Paging system would be in the best interest of our first responders.

Commercial Paging Service providers can provide wide area alphanumeric paging coverage but their networks are subject to failure during natural or man-made disasters. This system failure can result in loss of coverage during critical times. We further believe that security requirements can only be met by infrastructure under the control of the Public Safety entity.

Yamhill Communications Agency has determined that the use of a dedicated high band (150-174 MHz.) Public Safety (Part 90) paging frequency and the use of infrastructure designed for the equipment reliability and coverage required in today's Public Safety environment. Two high power paging channels (152.0075 and 163.250 MHz.) were considered for this new system. The 163.250 MHz. channel was determined to have the greatest distance to a co-channel user and therefore the least potential for interference. Yamhill Communications Agency applied for and was granted a license (WPZS819) for four sites to provide Countywide coverage. Yamhill Communications Agency has purchased base station equipment and a quantity of pagers. We are in the process of implementation of this new system. The paging receivers are to use the two-tone sequential format and are wide band receivers as a narrowband version of this product was not available at the time of purchase. It is the intention of Yamhill Communications Agency to implement narrowband alphanumeric paging as funding permits.

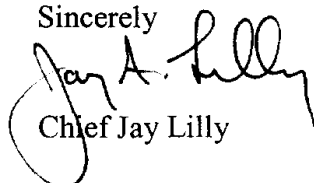
RECOMMENDATIONS

Yamhill Communications Agency urges that the Commission not take any action that would require existing Public Safety Licensees to replace wideband (25KHz.) paging equipment prior to January 1, 2018. We feel this will allow a reasonable time for existing Licensees to amortize recently purchased equipment.

Yamhill Communications Agency also urges that the Commission not relocate the 163.250 MHz. paging frequency to the Medical Radio Service. We believe the existing Special Emergency Coordinator (PS) allows this frequency a broader use by first Responders at a time when restricting frequency use would not be in the best interest of the Public Safety Community.

As with agencies all across this nation our agencies have to deal with the new age of Public Safety and Homeland Security. This is not the time to add the addition burden of dealing with required changes to their vital emergency paging system.

Sincerely

A handwritten signature in black ink, appearing to read "Jay A. Lilly". The signature is written in a cursive, flowing style. The first name "Jay" is prominent, followed by "A." and then "Lilly". The signature is positioned over the printed name "Chief Jay Lilly".

Chief Jay Lilly

Director

Yamhill Communications Agency

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Phone: